

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FRANK DONOFRIO,	:	
<i>on behalf of himself individually</i>	:	
<i>and on behalf of those similarly situated,</i>	:	
Plaintiff,	:	CIVIL ACTION
	:	No. 2:18-cv-00599-AB
<hr/>		
v.	:	
IKEA US RETAIL, LLC	:	
Defendant.	:	

WILLIAM V. ANTONELLI, JR.,	:	
<i>on behalf of himself individually</i>	:	
<i>and on behalf of those similarly situated,</i>	:	
Plaintiff,	:	CIVIL ACTION
	:	No. 2:19-cv-01286-AB
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IKEA HOLDING US, INC., <i>et al.</i>	:	
Defendants.	:	

BRANDON PAINES,	:	
<i>on behalf of himself individually</i>	:	
<i>and on behalf of those similarly situated,</i>	:	
Plaintiff,	:	CIVIL ACTION
	:	No. 2:19-cv-00723-AB
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IKEA HOLDING US, INC., <i>et al.</i>	:	
Defendants.	:	

**MOTION OF COUNSEL FOR LEAVE TO WITHDRAW AS COUNSEL  
FOR OPT-IN PLAINTIFF SHURANDA TAYLOR**

Counsel for Opt-In Plaintiff Shuranda Taylor (hereinafter “Opt-In Plaintiff Taylor”), Console Mattiacci Law, LLC (“CML”), hereby moves this Honorable Court pursuant to Local Rule 5.1(b), to permit CML to withdraw its representation as counsel for Opt-In Plaintiff Taylor. In support of this Motion, CML states:

1. Following this Court’s conditional certification of the above-captioned Age Discrimination in Employment Act (“ADEA”) collective actions, Opt-In Plaintiff Taylor received

a Notice of Collective Action and submitted consent to join forms opting in to the *Donofrio* matter on March 6, 2020 (*Donofrio* ECF 141), the *Paine* matter on April 13, 2020 (*Paine* ECF 86), and the *Antonelli* matter on April 13, 2020 (*Antonelli* ECF 71).

2. Opt-In Plaintiff Taylor retained CML to represent her in her claims of age discrimination against Defendants as an Opt-In Plaintiff in the above-captioned matters on May 20, 2020.

3. A fundamental disagreement has arisen between CML and Opt-In Plaintiff Taylor that inhibits CML's ability to continue to represent Opt-In Plaintiff Taylor, and which provides a basis for CML to withdraw its appearance and terminate its representation of Opt-In Plaintiff Taylor consistent with Rule 1.16(b) of the Pennsylvania Rules of Professional Conduct.<sup>1</sup>

4. CML notified Opt-In Plaintiff Taylor of its intention to file a motion to withdraw as her counsel. Opt-In Plaintiff Taylor opposes CML's withdrawing as her counsel.

5. CML has conferred with counsel for Defendants, who do not contest this Motion.

WHEREFORE, CML respectfully requests that the Court enter an Order granting CML permission to withdraw as Opt-In Plaintiff Taylor's counsel.

Respectfully submitted,

**CONSOLE MATTIACCI LAW, LLC**

/s/ Susan M. Saint-Antoine

Stephen G. Console

Laura C. Mattiacci

Susan M. Saint-Antoine

Caren N. Gurmankin

Evelyn R. Kallenbach

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<sup>1</sup> Due to confidentiality and attorney-client privilege concerns, the undersigned counsel cannot elaborate on the public docket as to the specific nature of the fundamental disagreement. Counsel would, however, be happy to provide additional information to the Court through an in-camera review or any other means this Court deems appropriate.

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Attorneys for Opt-In Plaintiff Shuranda Taylor

May 2, 2025